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ABSTRACT

The Seamless Summer Food Waiver is a federal initiative to help school food authorities reach a larger number of hungry children in low-income areas during the summer months, by reducing paperwork and administrative burdens associated with operating the Summer Food Service Program (SFSP). This issue brief describes the SFSP and the impact of the Seamless Waiver, based on visits to waiver school districts in California, telephone interviews with districts in Florida, and later telephone interviews with a nationally representative sample of 190 sponsors after the program was expanded nationally. The brief discusses: (1) the origins and operations of the SFSP; (2) the attractiveness of the Seamless Waiver for sponsor school districts; (3) the financial implications of the Waivers for sponsors; (4) the role of state agencies in the success of program innovations; (5) the purpose of focus on school districts for sponsoring a summer program; and (6) why the SFSP regulations are more stringent than those of the National School Lunch Program. The brief concludes with recommendations for the future operation of the Seamless Waiver as an ongoing policy. (HTH)

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TRENDS IN NUTRITION POLICY

Reaching More Hungry Children: The Seamless Summer Food Waiver

by Tania Tasse and Jim Ohls

This brief summarizes Mathematica's study of the Seamless Summer Food Waiver, a federal initiative to help school food authorities reach a larger number of hungry children in low-income areas during the summer months. The waiver reduces paperwork and administrative burdens associated with operating the Summer Food Service Program (SFSP). In 2001 and 2002, we visited waiver school districts in California and conducted detailed telephone interviews with waiver school districts in Florida. To supplement this research, we conducted telephone interviews in 2002 with a nationally representative sample of 190 Seamless Waiver sponsors, after the program was expanded nationally. The discussion below draws on the results of that survey and data supplied by the U.S. Department of Agriculture (USDA).

Bridging the Nutrition Gap

Ensuring that children have access to nutritious meals throughout the year is an important policy concern. The SFSP provides such meals for low-income children during the summer, when many school lunch and school breakfast programs stop operating. Run by local sponsors, such as government agencies, school districts, summer camps, and private nonprofit organizations, the program is financed by the federal government through the U.S. Department of Agriculture, Food and Nutrition Service. At its peak operations in July 2001, the SFSP served more than 2 million children on a typical summer day.

Over the past two years, some school districts have used a Seamless Waiver to help streamline summer food program administration by making SFSP rules more similar to those of the National School Lunch Program (NSLP). The waiver is intended to make the transition from the school year to the summertime feeding program as "seamless" as possible. Most districts already use the NSLP during the school year to provide free and reduced-price meals to low-income children. The waiver encourages districts to sponsor summer feeding programs, thus making summer meals available to more low-income children. In summer 2002, about 540 school districts, or about 14 percent of all sponsors operating the summer program, used the waiver.

Origins and Operations of the SFSP

The SFSP began in 1968 in response to concerns that children who depended on school lunches for adequate nutrition did not have enough food in the summer. Program sponsors typically establish meal sites in neighborhoods where more than half the families have low incomes. These sites often provide other activities, such as sports or recreational programs, arts and crafts, or summer school classes. In general, any child can come to a site for meals; no individual income eligibility test is required.

Because the SFSP is highly decentralized and has to be re-created each summer after being largely inactive during the school year, it is challenging to administer. The program must be run according to detailed operational rules, designed to ensure program integrity, that are widely viewed as reducing sponsor flexibility. For instance, food service generally must be provided from a fixed location, to facilitate site monitoring, which can reduce flexibility in running a summer program. On the accounting side, sponsors must track both the number of meals

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served and actual program costs, with reimbursement limited to the lesser of (1) budgeted amounts, (2) actual amounts, or (3) rate ceilings.[1] Many sponsors believe that these rules are more onerous than necessary to ensure program integrity, at least for the school districts that run feeding programs during the entire school year. Integrity issues have tended to arise mostly with sponsors other than school districts.

Another important issue in recent years has been the SFSP participation rate. In 2001, the number of SFSP meals served on a typical summer day was only 13 percent of the number of free and reduced-price lunches served per day during the school year.[2] Although participation levels might be expected to fluctuate at different times of the year, this low rate raises concerns that many children who need the SFSP may not have access to it.

Attractiveness to Sponsors

The Seamless Waiver garnered a substantial number of sponsors in its first year of general availability, and sponsors found it attractive to operate. In 2002, approximately 540 school district sponsors operated about 4,000 waiver sites that fed approximately 532,000 children on a typical day. In 2001, by comparison, 31,800 sites operated under the regular SFSP, feeding over 2 million children daily.

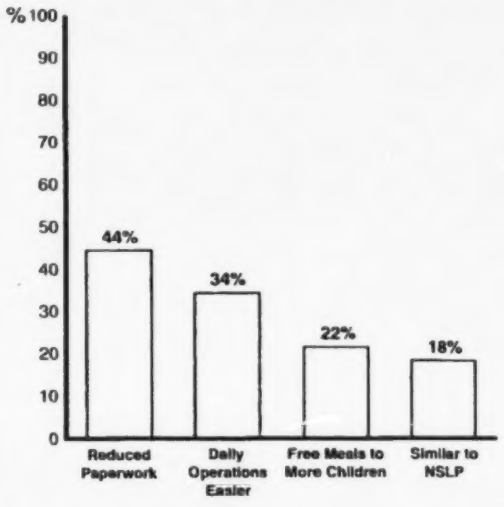
Most sponsors using the waiver felt that it helped streamline operations—about 75 percent said the application process was easier under the waiver than under the SFSP. When asked about the greatest program benefits, 34 percent said daily operations were easier; 44 percent cited reduced or simplified paperwork (Figure 1).

A California district that has used the waiver since 2001 reported being able to feed more children because of increased flexibility in serving times—children who came late did not have to be turned away. (The NSLP allows a wider time window for food service and does not require feeding programs to specify meal times in advance.) Reflecting these and similar advantages, 87 percent of the sponsors using the waiver in 2002 planned to do so in 2003.

[1] An exception is that in 13 states financial rules have been relaxed under a different policy experiment.

[2] This percentage represents average daily participation for July.

Figure 1: Main Perceived Waiver Benefits



Note: Multiple answers were allowed.

Financial Implications

Reimbursement rates are somewhat lower under the waiver than they are under the regular SFSP. However, for many sponsors, these lower rates were offset by cost savings from streamlining operations. Sixty-one percent of the seamless sponsors expected to at least break even. However, only 52 percent thought they would have broken even if they had operated the regular SFSP or the NSLP during the summertime (Figure 2). (Nonreimbursed costs must be covered by the sponsoring organizations or by other local funds.)

Figure 2: Financial Implications for Sponsors

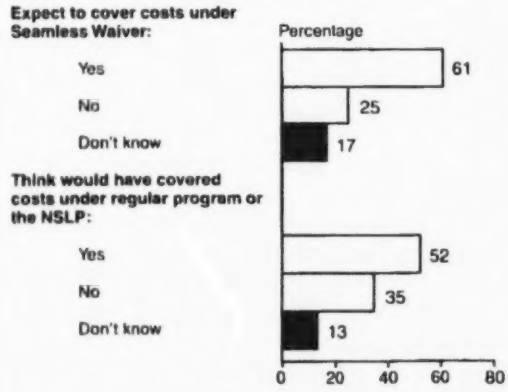
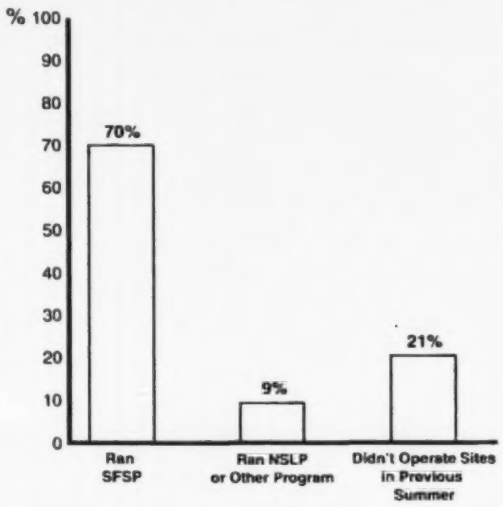


Figure 3: Operation of Feeding Sites in Previous Summer



To date, the waiver has had a limited effect on the number of children obtaining summer meals. In 2002, only about 21 percent of the sponsors operating the Seamless Waiver were new, and not all of these sponsors necessarily entered the program because of the waiver. Seventy percent of the school districts using the waiver in 2002 had participated in the SFSP in 2001 (Figure 3). Another 9 percent had run the NSLP or another program in summer 2001. (The NSLP can be used in the summer to feed students who are attending summer school or year-round academic classes.) New sponsors had considerably lower average daily attendance than seamless sponsors as a whole (531 children per day, compared to 972).

Sponsors operating either the SFSP or the NSLP in 2001 and converting to the Seamless Waiver in 2002 did not, on average, increase the number of meal sites they ran. Furthermore, two-thirds of the Seamless Waiver sponsors offered their programs at schools; in general, only a small number of the children fed at these sites were "walk-ins" not attending school-based programs. This is significant, because children in school-based academic programs can be fed under the NSLP.

On a typical day in summer 2002, the waiver resulted in an estimated 50,000 children receiving meals who would not otherwise have done so. This is about 10 percent of the children participating at the waiver sites, and about 2 percent of those participating in the SFSP overall. However, these data cover only the first year that the Seamless Waiver was widely available. As noted, sponsors thought the waiver was attractive from an operational point of view; as they gain more experience with it in the future, participation effects could be more substantial. Whether this will be the case cannot be determined based on the current evidence. However, 24 percent of the 2002 sponsors planning to use the waiver in 2003 also plan to operate more sites, whereas only 2 percent plan fewer sites.

States' Role in Innovations

State agencies play a critical role in the success of program innovations. SFSP funding flows through state agencies, which channel federal funds from USDA to sponsors. These state agencies are also responsible for disseminating program information and enforcing program rules. Of the sponsors in our sample using the Seamless Waiver, 97 percent had received information through their state agency. Furthermore, 72 percent of those hearing about it through the state agency perceived the state to be promoting the option; 88 percent indicated that the state had been a major factor in their decision to try the waiver. Other important sources of information were advocacy groups (22 percent) and other school districts (25 percent).

Why the Focus on School Districts?

The Seamless Waiver was designed to be used by school districts because they run the NSLP during the school year and are familiar with its rules and procedures. School districts accounted for nearly half of all SFSP sponsors in 2001. They typically have the experience and infrastructure needed to operate summer meal programs. For example, they already have staff, kitchen equipment, transportation, and storage facilities.

Districts operating the regular SFSP must switch to a different set of rules and paperwork in the summertime, and some of these rules are more restrictive than the requirements for the NSLP. The Seamless Waiver is attractive because it lets schools follow one set of procedures—the simpler NSLP rules—all year long.

Recommendations for the Future

On operational grounds alone, the Seamless Waiver appears to be worth consideration as an ongoing policy. School districts perceive it as simplifying operations significantly. Furthermore, it largely emulates existing NSLP rules and does not appear to relax program controls unduly. On the basis of the limited information available in this area, we found no evidence of any weakening in program integrity.

Whether the waiver will increase participation significantly over the longer term is still unclear—it did not do so in 2002, despite its adoption by a substantial number of school districts. However, as school districts become more familiar with the waiver, it may be used to enhance participation, both by drawing additional districts into summer feeding programs and encouraging existing school district sponsors to expand their programs.

Why Are SFSP Regulations More Stringent Than NSLP Ones?

SFSP regulations tend to be more stringent than those of the NSLP in terms of requiring sponsors to provide detailed accounting reports and specify times and places for food service operations. The reasons for this difference lie, at least in part, in the history of the SFSP. During the mid-1970s, the General Accounting Office discovered significant administrative problems in the SFSP, including poor-quality food, food waste, and off-site consumption of food. Most of these problems occurred among private, nonprofit sponsors. In response to these problems, the federal government tightened program regulations and increased program monitoring for all sponsors.

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